

## **EXHIBIT C**

1

2 SUPREME COURT OF THE STATE OF NEW YORK  
3 COUNTY OF NEW YORK

4 DAN HARVEY,

5 PLAINTIFF,

6 -against-

Index No:  
100748/2014

7 ANTHONY SICHENZIO,

8 DEFENDANT.

9

10 DATE: December 19, 2014

11 TIME: 10:11 A.M.

12

13

14 EXAMINATION BEFORE TRIAL of the  
15 Defendant, ANTHONY SICHENZIO, taken by the  
16 Plaintiff, pursuant to a Court Order, held  
17 at the offices of Diamond Reporting, Inc.,  
18 16 Court Street, Brooklyn, New York 11241,  
19 before Paula G. Bekker, a Notary Public of  
20 the State of New York.

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22

23

24

25

PLAINTIFF'S  
EXHIBIT  
504

1                   A. SICHENZIO

2 other names?

3                   A. No.

4                   Q. Your date of birth?

5                   A. 6/16/62.

6                   Q. I need your Social Security  
7 number. You can give us the whole number,  
8 but the court reporter is not going to put  
9 it on the record, she's just going to put  
10 Xs on the record.

11                  A. \*\*\*-\*\*-\*\*\*\*.

12                  Q. 41 William Penn Road in Warren,  
13 New Jersey, is that your primary residence?

14                  A. Yes.

15                  Q. How long have you lived there?

16                  A. 20 years.

17                  Q. Who do you live there with?

18                  A. My wife and my two children,  
19 one of which is off at school.

20                  Q. Your wife's name is?

21                  A. Patricia.

22                  Q. Does she have your last name?

23                  A. Yes.

24                  Q. How old is Patricia?

25                  A. 51.

1                   A. SICHENZIO

2                   Q. Does she work?

3                   A. No.

4                   Q. What is her date of birth?

5                   A. 9/4/63.

6                   Q. Has she ever worked during the  
7       marriage?

8                   A. No.

9                   Q. When were you married to  
10      Patricia?

11                  A. 9/17/94.

12                  Q. Whose name is the on the deed  
13      for 41 William Penn Road?

14                  A. My name.

15                  Q. Your name only?

16                  A. Yes.

17                  Q. No one else?

18                  A. I believe so, I'm not sure.

19                  Q. When did you purchase 41  
20      William Penn Road?

21                  A. 1994.

22                  Q. What was the purchase price?

23                  A. 525,000.

24                  Q. Did you purchase that cash or  
25      was there a loan?

1                           A. SICHENZIO  
2                           A. I do.  
3                           Q. How much is that yearly?  
4                           A. \$42,000 for tuition.  
5                           Q. Who pays for the apartment?  
6                           A. I do.  
7                           Q. How much is that?  
8                           A. \$1,300 a month.  
9                           Q. Do you have any personal staff  
10                          or employees who work for you?  
11                          A. No.  
12                          Q. How about a maid, cleaning  
13                          lady, something like that, anyone clean the  
14                          home?  
15                          A. There is someone that cleans  
16                          the house.  
17                          Q. How often?  
18                          A. Twice a month.  
19                          Q. How is she paid, cash or check?  
20                          A. I don't recall. My wife takes  
21                          care of that.  
22                          Q. Do you know how much that is?  
23                          A. \$160 each session.  
24                          Q. How about a driver, do you have  
25                          a driver?

1                           A. SICHENZIO

2                           A. I own a car company. I  
3 invested in a car company.

4                           MR. LETTERA: Just yes or no.

5                           Q. How did you get here today?

6                           A. A driver.

7                           Q. A driver in a car?

8                           A. Yes.

9                           Q. Do you own the car?

10                          A. Yes.

11                          Q. What kind of car?

12                          A. It's a Yukon.

13                          Q. What year?

14                          A. 2011.

15                          Q. Is it registered to you  
16 personally, or is it registered to a  
17 corporation?

18                          A. It's registered to me.

19                          Q. And it was your driver who  
20 drove that vehicle here today?

21                          A. Yes.

22                          Q. Is he employed by you  
23 personally, or is he employed through a  
24 corporation?

25                          A. He owns the car company that I

1                           A. SICHENZIO

2       pay these guys.

3                           Q.     What's the name of the company?

4                           A.     Atlas.

5                           Q.     Is that it, Atlas?

6                           A.     Yeah, Atlas Limo.

7                           Q.     Where are they out of?

8                           A.     I believe they're somewhere in  
9     New York, but I don't recall.

10                          Q.     You don't know the address?

11                          A.     No.

12                          Q.     What's the name of the driver?

13                          A.     Victor Ivanov, I-V-A-N-O-V.

14                          Q.     You say he's one of the  
15     principals, he's one of the owners of Atlas  
16     Limo?

17                          A.     Yes.

18                          Q.     And you're an owner of Atlas  
19     Limo as well?

20                          A.     I let them use my vehicles.

21                          Q.     Is that pursuant to a written  
22     agreement?

23                          A.     No.

24                          Q.     What vehicles do they use?

25                          A.     There's an '09 Yukon and 2011

1                           A. SICHENZIO

2       Yukon.

3                           Q.     And the '09 Yukon is also  
4     registered in your name personally?

5                           A.     Yes.

6                           Q.     And both Yukons are insured in  
7     your name personally?

8                           A.     Yes.

9                           Q.     So they're not insured through  
10   Atlas Limo?

11                          A.     No.

12                          Q.     They're not registered with  
13   Atlas Limo?

14                          A.     No.

15                          Q.     Do you use both of these  
16   vehicles for yourself, the 2011 and the  
17   2009 Yukon?

18                          A.     Yes.

19                          Q.     You use them on a daily basis?

20                          A.     Yes.

21                          Q.     Where are they stored?

22                          A.     At my house.

23                          Q.     So they're at your house  
24     overnight?

25                          A.     Yes.

1 A. SICHENZIO

2 Q. Both vehicles?

3 A. Yes.

4 Q. How often does Atlas Limo use  
5 them not for your purposes, for other  
6 purposes?

7 A. When they can get work, lately  
8 because there's not much work. With me, I  
9 haven't been paying them.

10 Q. How many drivers does Atlas  
11 Limo have?

12 A. Two.

13 Q. What's the other driver's name?

14 A. George.

15 Q. George what?

16 A. Niklin, N-I-K-L-I-N.

17 Q. Do you pay Victor Ivanov?

18 A. I pay him, yes.

19 Q. Do you pay him weekly, monthly  
20 or something else?

21 A. Whenever I can. There's no set  
22 schedule.

23 Q. When did you last pay him?

24 A. Yesterday.

25 Q. How much did you pay him?

1                           A. SICHENZIO

2                           A. I paid him \$2,500 for the  
3 month.

4                           Q. When did you last pay him  
5 before that?

6                           A. I don't recall, last month some  
7 time. I don't remember.

8                           Q. Do you get any compensation or  
9 proceeds from Atlas Limo?

10                          A. No.

11                          Q. Did you invest any money in  
12 Atlas Limo?

13                          A. No.

14                          Q. Is this a corporation pretty  
15 much set up for your drivers and your  
16 vehicles?

17                          A. No, they had it.

18                          Q. Do they service other  
19 customers?

20                          A. I don't recall. I don't know.

21                          Q. You said Victor drove you here  
22 today?

23                          A. Yes.

24                          Q. Is that in the 2011 Yukon?

25                          A. Yes.

1                   A. SICHENZIO

2                 Q. Is he waiting downstairs?

3                 A. Yes.

4                 Q. Will he be taking you home  
5 presumably today?

6                 A. Yes.

7                 Q. Will he be with you the rest of  
8 the day today?

9                 A. No.

10                Q. When you need his services, do  
11 you plan in advance, or do you just pick up  
12 the phone and call him?

13                A. I call him.

14                Q. Is he available to you 24 hours  
15 a day?

16                A. Unless he's got work somewhere  
17 else.

18                Q. What about your family members,  
19 do they use Victor and/or George as well?

20                A. Sometimes.

21                Q. Does your wife use them  
22 sometimes?

23                A. No.

24                Q. Who uses them?

25                A. In my family?

1                           A. SICHENZIO  
2                           Q. Yes, in your family.  
3                           A. Pick my son up from school once  
4                           a month or something like that.  
5                           Q. Who are you employed by now?  
6                           A. Wunderlich Securities.  
7                           Q. Where are they located?  
8                           A. 200 Liberty Street, New York,  
9                           New York.  
10                          Q. You're working there full-time?  
11                          A. Yes.  
12                          Q. You go to work every day?  
13                          A. Yes.  
14                          Q. Five days a week?  
15                          A. Yes.  
16                          Q. How do you get to work?  
17                          A. They take me to work and back.  
18                          Q. That's George and/or Victor?  
19                          A. Yes.  
20                          Q. So they drive you in?  
21                          A. Yes.  
22                          Q. They wait for you?  
23                          A. I don't know what they do  
24                          during the day. They drop me off and pick  
25                          me up.

1                   A. SICHENZIO

2                 Q.     What if you need a car in the  
3     middle of the day to go somewhere, to go  
4     see a client or to go to a meeting, do they  
5     take you as well?

6                 A.     If they're available.

7                 Q.     Have you considered not using a  
8     driver and a black car to get around to try  
9     to satisfy some of these outstanding debts,  
10    particularly the one to Mr. Harvey?

11                A.     Yes.

12                Q.     Is there a reason you haven't  
13    done that?

14                A.     I believe that imminently there  
15    will be money to pay Mr. Harvey.

16                Q.     We'll get to that in a minute.  
17    But over the past let's say six months,  
18    have you considered reducing your  
19    expenses --

20                A.     Yes, I have.

21                Q.     Let's talk about the \$2,500 a  
22    month for a car and driver, have you  
23    considered that?

24                A.     Yes, I have.

25                Q.     And is there a reason why you